

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA)	
)	
vs.)	Cause No. 4:20-CR-00167-HEA
)	
DAVID MAAS,)	
)	
Defendant.)	
)	

MOTIONS IN LIMINE

Comes now Defendant, David W. Maas, by and through Counsel, Neil J. Bruntrager of Bruntrager & Billings, P.C., and to the exclusion of any and all testimony to the following matters:

1. Any opinion testimony by witnesses whether civilian or police officers pursuant to Rule 701, regarding use of force by David Maas. Such testimony usurps and infringes upon the role of the jury.
2. Any opinion by any experts on any subject pursuant to Rule 702. No experts have been identified by the Government pursuant to Rule 702 or Rule 16. The Government has not provided a written summary of any testimony that the Government intends to use under the Federal Rules of Evidence during its case in chief.
3. Testimony as to the use of force training given to David Maas or training procedures and protocols provided by the Woodson Terrace Police Department or any police department. Such testimony is in the nature of opinion testimony and has not been identified under Rule 16, Rule 701 or Rule 702.

4. The internal investigation by Woodson Terrace of the events of April 14, 2019 involving the arrest of Isaiah Forman. Such testimony is irrelevant and misleading and would be confusing to the jury.

BRUNTRAGER & BILLINGS, P.C.

/s/ Neil J. Bruntrager
Neil J. Bruntrager #29688
225 S. Meramec Ave., Suite 1200
St. Louis, Missouri 63105
314- 646-0066
Fax 314-646-0065
Email: njbatty@aol.com

Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of August, 2022, the foregoing **Motions in Limine** was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all attorneys of record.

/s/ Neil J. Bruntrager